

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BOARD OF TRUSTEES OF THE)
NORTHERN ILLINOIS BENEFIT FUND,)
BOARD OF TRUSTEES OF THE)
NORTHERN ILLINOIS PENSION FUND,)
BOARD OF TRUSTEES OF THE)
NORTHERN ILLINOIS EDUCATION)
FUND, BOARD OF TRUSTEES OF) No. 08 C 306
THE NORTHERN ILLINOIS)
RETIREMENT FUND,) Judge Kendall
)
Plaintiffs,) Magistrate Judge Ashman
)
v.)
)
FOUR SEASONS HEATING &,)
COOLING, INC., an Illinois Corporation,)
and DAWN FRANCO, individually,)
)
Defendants.)

NOTICE OF MOTION

TO: Mr. Frank Franco and Mrs. Dawn Franco
Four Seasons Heating and Cooling, Inc.
56 East End Drive
Gilberts, IL 60136

PLEASE TAKE NOTICE that on **April 10, 2008 at 9:00 a.m.** or as soon hereafter as Counsel may be heard, I shall appear before **Judge Kendall**, in the **Courtroom 2319** usually occupied by him/her in the Federal District Court, 219 S. Dearborn Street. Chicago, Illinois, and then and there move and present the attached Motion for Order of Default and Judgment in Sum Certain.

Respectfully submitted,

**TRUSTEES OF THE NORTHERN
ILLINOIS BENEFIT FUND, LOCAL
501, et al.**

By: s/ Philip Brzozowski
One of their Attorneys

Donald D. Schwartz
Philip Brzozowski
ARNOLD AND KADJAN
19 West Jackson Blvd.
Chicago, IL 60604
(312) 236-0415

CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2008 I electronically filed the foregoing Motion for Order of Default and Judgment in Sum Certain and Notice of Motion with the Clerk of the Court using the CM/ECF system and to the following by U.S. Mail, postage prepaid:

Mr. Frank Franco and Mrs. Dawn Franco
Four Seasons Heating and Cooling, Inc.
56 East End Drive
Gilberts, IL 60136

s/Philip Brzozowski
ARNOLD AND KADJAN
19 W. Jackson Blvd., Suite 300
Chicago, IL 60604
Telephone No.: (312) 236-0415
Facsimile No.: (312) 341-0438
Dated: March 28, 2008